

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

ENCOMPASS INSURANCE COMPANY OF  
MASSACHUSETTS,

Plaintiff,

vs.

JOSEPH D. GIAMPA, FREDERICK T.  
GIAMPA, ADVANCED SPINE CENTERS,  
INC., d/b/a FIRST SPINE REHAB, FUTURE  
MANAGEMENT CORPORATION, FUTURE  
MANAGEMENT BUSINESS TRUST,  
EDWARD KENNEDY, BRIAN J.  
CULLINEY, D.C. and JENNIFER  
McCONNELL, D.C.

Defendants.

Civil Action No. 1:05-cv-11693-RCL

**PLAINTIFF'S MOTION TO COMPEL ANSWERS TO INTERROGATORIES**

NOW COMES the plaintiff, Encompass Insurance Company of Massachusetts (hereinafter "Encompass"), pursuant to Fed. R. Civ. P. 37 and Local Rule 37.1 and respectfully requests that this Honorable Court enter an Order COMPELLING defendant, Advanced Spine Centers, d/b/a First Spine Rehab, to provide complete responses to Encompass' First Set of Interrogatories. Encompass hereby submits the within memorandum of law in support of the instant motion.

WHEREFORE, for all the reasons that follow, plaintiff, Encompass Insurance Company, respectfully requests that this Honorable Court enter an Order **COMPELLING** defendant, Advanced Spine Centers, d/b/a First Spine Rehab, to provide complete and accurate responses to Encompass' First Set of Interrogatories within twenty (20) days of this Court's Order.

Respectfully submitted,  
*Encompass Insurance Company*,  
By its attorneys,

/s/ Nathan A. Tilden

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SMITH & BRINK, P.C.  
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(617) 770-2214

Dated: June 25, 2007

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Defendants.

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**ORDER**

Whereas after consideration of plaintiff's Motion to Compel Answers to  
Interrogatories, it is hereby ORDERED and ADJUDGED:

- The defendant, Advanced Spine Centers, d/b/a First Spine Rehab, shall produce  
a true and accurate response to plaintiff's Interrogatory # 9 within twenty (20)  
days of this Order.

\_\_\_\_\_  
United States Magistrate Judge,  
Judith G. Dein

Dated: \_\_\_\_\_